

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:19cr130
)	
OKELLO T. CHATRIE,)	
Defendant)	

**DEFENDANT’S MOTION TO DEFER GOOGLE’S SUBPOENA COMPLIANCE
DEADLINE TO CLOSE OF BUSINESS ON FRIDAY, MARCH 6, 2020**

Okello Chatrie, through counsel, moves the Court to extend Google’s subpoena compliance deadline to close of business on Friday, March 6, 2020. In support of this motion, Mr. Chatrie states the following:

1. On February 4, 2020, Mr. Chatrie moved the Court to issue a subpoena *duces tecum* to Google for the production of information necessary to litigate Mr. Chatrie’s pending Motion to Suppress Evidence Obtained from a “Geofence” General Warrant, *see* ECF No. 29. *See* ECF No. 82.
2. On February 7, 2020, the Court granted that motion and issued a subpoena *duces tecum* for Google to produce the requested information. *See* ECF Nos. 85 and 86. Mr. Chatrie had sought and the Court ordered that Google produce the information subject to the subpoena *duces tecum* by Friday, February 21, 2020, at noon. *See* ECF No. 86 at 1.
3. Counsel for Mr. Chatrie have been in communication with counsel for Google to discuss the subpoena *duces tecum* in ECF No. 86. Counsel for Google have requested additional time to produce the information in the form of an affidavit. If such an affidavit sufficiently addresses the information that the subpoena orders Google to

produce in part or in whole, the defense can either move the Court to narrow the scope of the subpoena or withdraw it as appropriate.

Thus, Mr. Chatrie moves the Court to extend Google's subpoena compliance deadline to close of business on Friday, March 6, 2020.

Respectfully submitted,
OKELLO T. CHATRIE

By: _____/s/_____
Laura Koenig
Va. Bar No. 86840
Counsel for Defendant
Office of the Federal Public Defender
701 E Broad Street, Suite 3600
Richmond, VA 23219-1884
Ph. (804) 565-0881
Fax (804) 648-5033
laura_koenig@fd.org

Michael W. Price
NY Bar No. 4771697 (pro hac vice)
Counsel for Defendant
National Association of Criminal Defense Lawyers
Fourth Amendment Center
1660 L St. NW, 12th Floor
Washington, D.C. 20036
Ph. (202) 465-7615
Fax (202) 872-8690
mprice@nacdl.org

Paul G. Gill
Va. Bar No. 31461
Counsel for Defendant
Office of the Federal Public Defender
701 E Broad Street, Suite 3600
Richmond, VA 23219-1884
Ph. (804) 565-0870
Fax (804) 648-5033
paul_gill@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2020, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/

Laura Koenig
Va. Bar No. 86840
Counsel for Defendant
Office of the Federal Public Defender
701 E Broad Street, Suite 3600
Richmond, VA 23219-1884
Ph. (804) 565-0881
Fax (804) 648-5033
laura_koenig@fd.org